

Message

---

**From:** Lazos, Pamela [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=15D4F11C6327474BB424A24CBD406E93-PLAZOS]  
**Sent:** 9/9/2021 8:09:36 PM  
**To:** Rivera, Nina [Rivera.Nina@epa.gov]  
**Subject:** FW: CRW - CD Modification  
**Attachments:** ENV\_ENFORCEMENT-#3007470-v2-CRW\_Draft\_CD\_Mod\_with\_Nina\_Edits.DOCX

Devon wanted to wait until it was our turn to add in your comments since the CD was already out for Defendant's review when we got them. We went over them today and they are now incorporated, although a couple were not adopted for the reasons stated herein. Sending this version because the markup is a mess so this one is easier to read.  
pl

---

**From:** Ahearn, Devon (ENRD) <Devon.Ahearn@usdoj.gov>  
**Sent:** Thursday, September 09, 2021 3:47 PM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Subject:** RE: CRW - CD Modification

Hi Pam,

Here are the responses to Nina's edits that we discussed today. I highlighted all of her edits and our responses in yellow. Let me know if you have any questions.

Thanks!  
Devon

Devon Ahearn  
Trial Attorney  
[Devon.ahearn@usdoj.gov](mailto:Devon.ahearn@usdoj.gov)  
(202) 514-2717

---

**From:** Lazos, Pamela <[Lazos.Pamela@epa.gov](mailto:Lazos.Pamela@epa.gov)>  
**Sent:** Thursday, September 9, 2021 9:11 AM  
**To:** Ahearn, Devon (ENRD) <[Devon.Ahearn@usdoj.gov](mailto:Devon.Ahearn@usdoj.gov)>  
**Subject:** FW: CRW - CD Modification

Also sending this one more time to make sure these edits get into the CD.  
Thanks, Devon!  
pam

---

**From:** Rivera, Nina <[Rivera.Nina@epa.gov](mailto:Rivera.Nina@epa.gov)>  
**Sent:** Thursday, July 01, 2021 5:01 PM  
**To:** Lazos, Pamela <[Lazos.Pamela@epa.gov](mailto:Lazos.Pamela@epa.gov)>  
**Subject:** RE: CRW - CD Modification

Only a couple of minor edits, and a number of comments mostly asking whether CRW had not yet completed

## Ex. 5 Deliberative Process (DP)

---

**From:** Lazos, Pamela <[Lazos.Pamela@epa.gov](mailto:Lazos.Pamela@epa.gov)>

**Sent:** Tuesday, June 29, 2021 2:06 PM

**To:** Rivera, Nina <[Rivera.Nina@epa.gov](mailto:Rivera.Nina@epa.gov)>

**Subject:** FW: CRW - CD Modification

Woop woop woop woop!

---

**From:** Ahearn, Devon (ENRD) <[Devon.Ahearn@usdoj.gov](mailto:Devon.Ahearn@usdoj.gov)>

**Sent:** Tuesday, June 29, 2021 1:20 PM

**To:** Andes, Fredric <[Fredric.Andes@btlaw.com](mailto:Fredric.Andes@btlaw.com)>

**Cc:** Levine, Bradley (ENRD) <[Bradley.Levine@usdoj.gov](mailto:Bradley.Levine@usdoj.gov)>; Nanda, Sushila <[Nanda.Sushila@epa.gov](mailto:Nanda.Sushila@epa.gov)>; Lazos, Pamela <[Lazos.Pamela@epa.gov](mailto:Lazos.Pamela@epa.gov)>; Williams, Janna <[jannwillia@pa.gov](mailto:jannwillia@pa.gov)>; Herb, Dawn <[dherb@pa.gov](mailto:dherb@pa.gov)>

**Subject:** CRW - CD Modification

*Confidential Settlement Communication – Subject to FRE 408*

Fred,

I have attached a proposed Modification to the 2015 Consent Decree for CRW's review. I have also attached a redline that compares the Modification to the version of the Decree that we filed in 2015. Where appropriate, we have removed or modified provisions to bring the document up to date—those edits are reflected in the redline. You'll also see a number of comments/questions for discussion. To that end, we would like to schedule a virtual meeting with CRW within the next 2-3 weeks. Please let me know what dates/times work well for your team and we will schedule the meeting.

We look forward to hearing back from you. Please don't hesitate to reach out with any questions in the meantime.

Thanks,  
Devon

Devon Ahearn

Trial Attorney

Environmental Enforcement Section | ENRD | U.S. Department of Justice

Regular Mail: P.O. Box 7611, Washington, DC 20044-7611

Overnight and Courier: 150 M Street NE, Suite 2.900, Washington, DC 20002

[Devon.ahearn@usdoj.gov](mailto:Devon.ahearn@usdoj.gov)

(202) 514-2717